

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

Criminal No. 23-748 KWR

v.

JOSE LOUISE TRUJILLO,

Defendant,

**FIFTH UNOPPOSED MOTION TO VACATE AND RESET SENTENCING HEARING  
AND RELATED DEADLINES**

Defendant Jose Louise Trujillo (“Defendant”) respectfully moves this Court to vacate Defendant’s current sentencing date of October 30, 2024 and all related deadlines, including the deadline for filing of objections to the Presentence Report. Defendant further requests that the Court reset his sentencing hearing at a later date no less than sixty (60) days after October 30, 2024. As grounds, Defendant states as follows:

1. On January 8, 2024, pursuant to a plea agreement with the United States, Defendant pled guilty to Counts 1, 5, and 9, of the Indictment in this case, as well as to an Information charging a violation of 21 U.S.C. § 841(a)(1) and (B)(1)(C). Docs. 118, 115.
2. The Probation Department released Defendant’s Presentence Report on February 19, 2024.
3. Defendant is currently scheduled for sentencing before this Court on October 30, 2024. Doc. 245.
4. Undersigned counsel requires additional time to prepare for Defendant’s sentencing hearing. The additional time is needed for counsel to develop facts and arguments

relevant to Defendant's sentencing. Development of these facts and arguments will require no less than sixty (60) days from October 30, 2024.

5. The interests of justice will not be harmed by granting the requested continuance.
6. Defendant currently remains in the custody of the United States Marshals Service.
7. Undersigned counsel has consulted with the United States concerning this motion and the United States does not oppose the relief requested herein.

### **CONCLUSION**

For the foregoing reasons, Defendant respectfully requests that this Court vacate the current sentencing date of October 30, 2024 and all related deadlines, including the deadline for filing objections to the Presentence Report, and reset Defendant's sentencing hearing at a date no less than sixty (60) days after October 30, 2024.

Respectfully submitted,

**HOLLAND & HART LLP**

*/s/ John C. Anderson*

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**Attorney for Defendant Jose Louise Trujillo**

### **CERTIFICATE OF SERVICE**

I hereby certify that on October 6, 2024 I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

Assistant United States Attorney Jeremy Pena  
Assistant United States Attorney Patrick Cordova

Trial Attorney Ryan Crosswell

**Counsel for United States**

/s/ John C. Anderson  
John C. Anderson

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